

Following is my reply to the docket 03-104:

I am in agreement with comments filed by the IEEE, ARRL Inc., the national association for Amateur Radio; and those of numerous Television Broadcasters, Shortwave Broadcasters, and other licensed users of the HF spectrum from 1.0 to 80.0 MHz.

Proponents of BPL have failed to provide evidence of comprehensive RF interference test results on the effective of BPL RFI on other licensed services having been performed. In lieu of the absence of these test results, it would not be good engineering practice to authorize an increase in Part 15 device powers. Without extensive RFI testing to insure such devices do not cause interfere with licensed radio services, the results could be catastrophic. Once authorization has been granted to increase in Part 15 device powers it will be too late to remedy interference to licensed radio spectrum users. Both reception and transmission of licensed services, including emergency and public service will not be reliable or adequate to meet public needs.

Overwhelming interference from Test BPL sites has already observed by not only ARRL but also independent engineers of RFI Inc., in travels across the USA. Thus approval of BPL would encourage other radio spectrum users to use increased power for transmission due to this interference.

BPL has not been shown to be compatible with existing users of the HF spectrum, and would be a threat to the public, since it would block emergency radio communications by FEMA emergency radio networks, the American Red Cross, Salvation Army, and other emergency radio networks. These networks support weather emergency communications on behalf of NOAA, and the Homeland Security Dept. emergency communications in any type of disaster or attack upon conventional communications.

The use of widely spaced power transmission conductors for an RF transmission medium is flawed, as the conductors are not suited to shielded transmission of RF data. Radiation resulting in interference to other licensed users and listeners of the HF spectrum would result.

BPL would require RF bypasses around transformers, which would further aggravate the questionable reliability of the Power System. The recent multi state blackout shows the transmission paths are unreliable and in a questionable state for the transmission of AC power let alone piggy backed RF data of BPL.

For the above stated reasons and other engineering considerations of adequate service of Broadband data by non interfering means, BPL over Power Lines should NOT be developed. It would only cause more problems for present interference receiving, licensed users, of the HF spectrum. The ambient RF noise level can be shown to have become higher over the last several years, and BPL should not be added to that increase in spectrum noise pollution.